

Attachment 2

Initial comments submitted by the Department of Historic Resources and City of Richmond on the EIR for the Recreational Sports-Capital Improvements and Acquisition-911 Green Alley, Monroe Park Campus, Virginia Commonwealth University, City of Richmond (Agency Code 236, Project Codes 17405-001 & 17037- 007, DEQ 07-106S)

VCU submitted the 2007 EIR describing the amended student recreation center addition and acquisition of 911 Green Alley on May 25, 2007. DHR and the City found significant deficiencies in the EIR with respect to its alternatives analysis, impacts on historic resources, and design deficiencies. The following is a summary of initial review comments from DHR and the City to the 2007 EIR.

Department of Historic Resources

Alternatives Analysis Deficiencies. DHR noted that in its April 27, 2007 letter (attached), the agency outlined its requests for information to be included in the new EIR addressing *all* project alternatives and the potential impacts to historic properties and archeological sites associated with each alternative. DHR found that the current EIR, however, addresses DHR's requests for information with respect to only one alternative, Option 2 (preferred alternative). The new building would require the closure of historic Green Alley, and the demolition of two historic structures, 911 and 917 Green Alley, within the Oregon Hill Historic District. Furthermore, VCU had begun construction of Option 2 (Lobs and Lessons Tennis Center), "thereby foreclosing on further consideration" (EIR, Sec. 4.4) of other alternatives. DHR found the foreclosure limited the agency's ability to comment on any alternatives, and further, it limited VCU's ability to address DHR's concerns for the potential impacts of this project on historic properties.

Impacts Analysis Deficiencies. The EIR's (Section 3.5) discussion of impacts did not address the request for an analysis of the project's potential direct and indirect impacts on historic properties, including archeological sites. VCU's responses to DHR's concerns (EIR, Appendix 3) similarly did not address these potential impacts. Based on DHR's review of Option 2 as described in the EIR, the agency believes that the proposed Recreation Center would have significant impacts upon historic properties within the Oregon Hill Historic District and the VCU Monroe Park Historic District, specifically the City Market/Auditorium, which is individually eligible for the National Register of Historic Places.

DHR provided the following comments, which were discussed without the information that the agency requested for inclusion in the EIR. In the absence of that information, DHR commented on the project based on its knowledge of its historic contexts, identified historic properties, and the agency's understanding of Option 2 as described in the EIR.

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- The demolition of 911 and 917 Green Alley, two historic structures contributing to the significance of the Oregon Hill Historic District, will be an adverse effect to this Historic District. In addition, the closure of Green Alley will eliminate this surviving feature of the historic circulation system. The responses in the EIR (Appendix 3) to DHR's questions do not provide a justification for ruling out relocation of the structures as an option to demolition. In other discussions with VCU officials, the relocation was described as prohibitively expensive, but DHR lacks a formal response that would justify this alternative as infeasible. Similarly, the EIR states that rehabilitation of the two structures is not feasible, but did not fully address DHR recommendations that these two structures be incorporated into the footprint of the new building, thus avoiding demolition.

DHR reiterated its request that the University consider this alternative to minimize the adverse effect to these two historic structures. According to DHR, VCU had stated that it would "commission a study to evaluate other surviving examples of buildings similar to 911 and 915 Green Alley" in response to DHR's concern over the rarity of this property type within Richmond, and DHR supports such a study. The suggestion to "commemorate" Green Alley within the new building by use of a distinctive floor pattern should be discussed after all other efforts to preserve the buildings and remaining circulation system have been exhausted.

- As illustrated in the schematic design drawings (EIR, Appendix 5), DHR determined that the proposed building would have an adverse visual effect on the Oregon Hill Historic District, specifically the historic residences on Cherry Street (including 130 S. Cherry, a DHR easement property), the historic St. Andrews Housing on Cumberland and Linden Streets, as well as the City Market/Auditorium located within the VCU Monroe Park Historic District. For example, historic residences on Cherry Street will view an extended building wall. As depicted in the EIR, the scale, massing, and architectural character of the proposed building are not compatible with the historic context and character of adjacent historic properties, and will have visual impacts associated with an urban "superblock" rather than a pedestrian-scale neighborhood. DHR recommended that VCU explore all alternatives to avoid or minimize these impacts through collaboration with DHR on any further design development, which should address a reduction in the building footprint, setbacks, articulation of the façade and side elevations, materials and finishes, and landscape treatments that could provide compatible visual connections to the adjacent historic properties.
- The proposed physical connections between the City Market/Auditorium's southern and eastern walls and the new building, if not reversible, may be an

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adverse direct effect to the historic building. In order to avoid or minimize the potential direct effects to the structure, DHR recommended that VCU prepare a rehabilitation treatment plan for the City Market/Auditorium that adheres to the *Secretary of the Interior Standards for Rehabilitation*. The treatment plan should incorporate the information provided in the "Historical Investigative Analysis for Cary Street Gym Expansion" prepared by Commonwealth Architects for VCU (January, 2007), and specifically address all proposed alterations to the historic building. It should also address the potential for archeological discovery during the excavation of areas adjacent to the City Market/Auditorium. In addition to this treatment plan, specific design recommendations should be developed in consultation with DHR to insure that any further design of the new building address the visual and material compatibility of new construction with the historic character of the City Market/Auditorium. These design recommendations should specifically address plans such as the transparent design element proposed to distinguish the historic structure from the new building, and the interior layout of this element as it relates to the building's floorplan.

Design Deficiencies. DHR found that VCU's responses in the EIR to the guidance provided in the agency's April 27, 2007 letter included a number of individual suggestions that should be considered within the design framework for the project as whole, rather than as discrete elements. For example, specific design responses (such as location of main entrance, use of new windows for visual connections, streetscape treatments, articulation of facades, and the use of specific materials and finishes) require further development to insure their compatibility with the historic context in which the new building will reside. However, the larger issue of massing, scale, and architectural character of the proposed Recreation Center remains. VCU stated in the EIR that they plan to "[S]et the new building at a scale that is compatible with the existing residential buildings along Cherry Street and the retail buildings along Cary Street." The schematic drawings, however, illustrate a building complex that is incompatible in scale with the adjacent historic properties. The resolution of the scale and massing of this new building within its historic context is critical, and should be a primary consideration before any further design development occurs.

City of Richmond

The City of Richmond originally provided comments on the EIR on June 15, 2007. However, on June 26, 2007 the VCU Board of Visitors approved amendments to the University's 2004 Master Site Plan that resulted in the relocation of the Recreational Sports Center to West Cary Street, and a redrawing of the Monroe Park Campus Boundary to encompass 911 Green Alley. According to the City, the 2004 Master Plan was revised due to a 2005 study of the growing demands of two VCU sports functions,

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NCAA Athletics and Recreational Sports, both currently housed in the Siegel Center. It was recommended by an architectural consultant that VCU keep NCAA Athletics at the Siegel Center and relocate all Recreational Sports to West Cary Street.

Due to the Master Plan amendments, the City resubmitted comments in a June 29, 2007 letter that supersedes its previous submission in light of the effect of the Master Plan amendments on the proposal. The City stated that it gives significant weight to Master Plans, in forming its responses to EIR's. The City also noted that it would have been helpful if VCU had revised its Master Plan prior to the submission of the EIR for the proposal to avoid the need for another review by the City. However, based on the updated information the City provided the following review comments.

Alternative Analysis Deficiencies. The City notes that the EIR includes illustrations of four options for the Recreational Sports Center location. However, three of the four options were no longer viable. Option 1 was withdrawn by VCU over objections by the City (2006 EIR) and the Oregon Hill Neighborhood Association to the construction of a building on a public street (Linden Street). Options 3 and 4 could no longer be considered due to the recent construction of the Mary and Frances Youth Center (Lobs and Lessons Tennis). The City believes that Options 3 and 4 were the superior ones from a neighborhood planning and design standpoint. The City requests that in the future VCU not commence construction on any projects before the EIR review is complete.

According to the City, VCU had suggested a fifth option; locating the Recreational Sports Center to the site of the current NCAA athletic fields on Cary Street. This would allow for the construction of a large sports center with room to grow in the future. This would also require the relocation of the athletic fields off campus or that the fields be built on the roof of the new sports center. According to the City, VCU determined that off-campus fields are not an option given the need to have the indoor and outdoor functions in direct proximity. Additionally, they explained that the construction of a facility that could accommodate roof fields is not financially feasible for the University at this time and the need for a new sports center in the immediate future is necessary to meet the current size of the large student body.

Preferred Option 2 Deficiencies. The City expressed concerns with the preferred Option 2 proposal describe in the EIR for the following reasons: 1) it required the demolition of two historic structures; 2) it required the closure of a historic public alleyway; 3) it blocked two prominent façades of the Cary Street Gym from public street view; and 4) the design is not entirely compatible with the historic character and scale of the immediately adjoining structures on Cary and Cherry Streets.

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- 1) **Demolition of 911 and 917 Green Alley.** The City notes that the two structures proposed to be demolished, 911 and 917 Green Alley, are former livery stables. These structures are listed on the Oregon Hill National Register Historic District. They once served as livery stables to the historic Market/Auditorium building (Cary Street Gym) and are rare remaining examples in the City of this type of architecture. Retention of these structures is important in telling the architectural history of the City in the 1900's. They deserve serious consideration prior to any alteration or demolition. There should be some form of incorporation of the livery stables into the new Recreational Sports Center design. The City recognizes and commends VCU's record of preserving many historic structures throughout downtown. The City encourages some form of continued preservation for this project as well.
- 2) **Closure of Green Alley.** The revised proposal now affects the closure of a public alley. Similar to the previously-proposed closing of Linden Street, the closing of Green Alley would affect connectivity for both pedestrians and vehicles. However, the EIR (page 55) indicates that a "proposed new alley" and adjoining parking lot aisle will replace the removal of Green Alley. This is very important, because the retention of public streets and alleyways throughout the downtown, Oregon Hill, and the Fan is critical for the smooth circulation of vehicles and pedestrians. Alleyways are particularly important for the location of services (trash, deliveries, parking lots, etc.) that should not be on major streets.

According to the EIR (Appendix, VHB traffic report dated 5/11/07), justification for closing Green Alley is the low volume of existing traffic at 168 vehicles per day. However, the City believes that is based on incomplete information because it does not take into account the additional traffic that will be created by the large new facility and all of its expected staff and visitors. This is all the more reason to ensure the construction of the proposed new alleyway with continuous connection through the parking lot aisle. No projected traffic counts for the new facilities were included in this report.

The partial memorializing of Green Alley into the proposed enclosed "Concourse" is also important. Attention should be paid to the finishes and patterns of the concourse, to commemorate the historic alleyway, as the design is further developed and finalized. The alleyway's original materials are worth exploring. It is possible that it was originally paved in stone and brick as with other Richmond alleyways.

Obstruction of the Cary Street Gym Facade. The new structure is proposed to be directly attached to the eastern and southern facades of the Cary Street Gym. The gym was originally built as the City's Farmer's Market in 1890 and was later converted to the

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City Auditorium. This building was clearly designed to be a stand alone building given the equal façade treatment of all four sides, the high degree of detail, the symmetry of the building in all directions, and the prominent roof design. These features make it a unique and valued building in the City of Richmond. Building directly up to the southern and eastern facades will diminish its current prominence as a stand alone structure. Further design study by VCU and its project architects, Hastings+Chivetta and Mosley Architects, is required to expose and highlight more of the facades from street view along Cary and Linden Streets.

- 3) **Historic Character and Scale.** The proposed new recreation center is four times as large as the existing Cary Street Gym (100,000 square feet vs. 25,000 square feet). This means that the landmark function of the existing gym is subordinated by the new construction (compromising the integrity of the historic structure).

Also, by building to the east and south, this very large new structure is placed closer to the modest, residential scaled buildings that the Oregon Hill National Register Historic District attempts to recognize and protect. The buildings shown in the EIR (appendix, page 34) as examples of the neighborhood massing and scale are not reflective of the immediately surrounding structures on Cherry, Cumberland, Linden and Cary Streets. The City's preliminary research indicates that these building heights are approximately 25'-30'. The residential homes on Cherry Street would be minimized by the massing, scale, and rhythm of the new construction, as currently designed, and their setting as part of a residential neighborhood would be noticeably compromised. The perspective of the Cherry Street frontage from the southeast was not included in the presentation. Showing this view would provide a better understanding of the impact of the new structure on these smaller historic structures. The perspective of the Cherry Street façade from the northeast was included in the report, but the transition between the two buildings (new and old) is obscured by trees drawn into the rendering. Again, this view needs to be studied more carefully in design development to carefully handle the details of this important transition.

Some elements of the architecture of the proposed building have merit, but require further study and some revision in scale, rhythm, and character to better relate to the immediately surrounding historic structures. The segmental arched roofs of the proposed structure create a distinct and interesting shape that competes with, but does not overpower the hipped roof on the gym. A well designed portion of the proposal is at the southwest corner, where a flat roof is used over the leisure pool, thereby transitioning from the three-story, arched-roof, institutional scale building to the two-story residential scale of the rears of the housing on Cumberland Street.

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The reason for not moving the proposed building "up" to the property line on Cary Street is unclear. It should be moved, or, as a preferred alternative, the center six-bays of windows could project in plan to fill in some of the offset. This would break up the flatness of the present design. The fenestration of the facades is well designed except along Cherry Street. The tall thin windows in the large brick bays are poorly proportioned and do not relate to any of the facades in the neighborhood. These tall skinny windows are reminiscent of a 1960's junior high school. Additionally, it is unclear from the drawings how the double doors at each end of the gymnasium will be articulated. The relationship between these doorways and the street will be important. They are a critical connection between the building, the streetscape and the neighborhood.

While the facades appear to have a good amount of detail at this point in the design process, the City will need further information, such as specific materials used, transition details (i.e., reveals, soldier coursing), the depth of projecting windows, columns, etc. Good detailing, articulation, and variation in the projections along the facades will prevent flat, monotonous facades reflective of some of the new buildings that were built recently on Broad Street. The EIR (page 5) mentions that one of the new building exterior materials will be "pre-cast stone." The City assumes that VCU meant "pre-cast concrete" to simulate stone. The City would, however, encourage the use of real stone particularly on the base of the building. Other material selections are of particular interest to the City given the effect they will have on the overall success of the building. Regarding the massing and scale of the new structure, VCU should explore lowering the ground floor level to prevent the need for outdoor stairs and ramps and to lower the overall height of the building.